

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

K.W., T.O., S.D.,	)	
	)	
Plaintiffs,	)	
	)	Civil Action No. 1:25-cv-03201-TRJ
v.	)	
	)	
JANKI MOTEL, INC.	)	JURY TRIAL DEMANDED
	)	
Defendant.	)	

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**DEFENDANT’S NOTICE TO TAKE THE  
VIDEO DEPOSITION OF PLAINTIFF T.O.**

PLEASE TAKE NOTICE that on Thursday, December 4, 2025, beginning at 10:00 a.m. at Holiday Inn Express & Suites, 116 Hospitality Drive, Jackson, Georgia 30233, the undersigned counsel for defendant will take the video deposition of plaintiff T.O. pursuant to Rule 30 of the Federal Rules of Civil Procedure for all purposes authorized by law before a court reporter duly authorized to administer oaths. The deposition will be taken before a certified court reporter and videographer or some other officer duly authorized by law to take depositions and will continue from day to day, excluding Saturdays, Sundays, and holidays, until its completion.

This 10<sup>th</sup> day of November, 2025.

[SIGNATURE ON FOLLOWING PAGE]

**FREEMAN MATHIS & GARY, LLP**

/s/ Emma J. Fennelly

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically submitted the foregoing  
**DEFENDANT’S NOTICE TO TAKE THE VIDEO DEPOSITION OF  
PLAINTIFF T.O.** with the Clerk of Court using the CM/ECF system which will  
automatically send email notification of such filing to the following attorneys of  
record:

Patrick J. McDonough  
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Anderson Tate & Carr  
*Attorneys for Plaintiffs*

This 10<sup>th</sup> day of November, 2025.

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